

RECEIVED

## UNITED STATES DISTRICT COURT

OCT 28 2023

for the  
MIDDLE District of TENNESSEU.S. District Court  
Middle District of TNNASHVILLE Division

Case No.

(to be filled in by the Clerk's Office)

D.F.F. C.R. INC "THE HERMITAGE"

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

ALAN WISEMERITAGE HOMES "ETAL"MARK REYNOLDS "ETAL"GEORGE H. ROBERTSON IIIJACQUELINE ROBERTSON

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☐ Yes ☐ NoJUDGE WAVELY D. CRENSHAW

## COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

## NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Address

County

Telephone Number

E-Mail Address

D.F. & C.R. INC "THE HERMITAGE"  
1209 Tulip Grove Rd  
HERMITAGE TN 37076  
City State Zip Code  
DAVIDSON COUNTY  
(615) 889-8896  
dfccmc@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

ALAN WISE "et al"  
GRANDVIEW CUSTOMS HOME LLC  
1312 CENTRAL CT.  
HERMITAGE TN 37076  
City State Zip Code

☐ Individual capacity ☐ Official capacity

Defendant No. 2

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

MARK REYNOLDS SR. ATTORNEY / VICE  
PRESIDENT / MERITAGE HOMES "et al"  
16410 N 91ST ST 104  
SCOTTSDALE AZ 85260  
City State Zip Code  
MARIOPA COUNTY  
(480) 515-8045  
WWW.MERITAGEHOMES.COM

☐ Individual capacity ☐ Official capacity

## Defendant No. 3

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

MERITAGE HOMES OF SCOTTSDALE AZ  
 ALL INVOLVED - "ETAL" CEO  
 16410 N 9<sup>th</sup> Suite 104  
 SCOTTSDALE TN 85260  
 City State Zip Code

MARICOPA

480(515-8100)

WWW.MERITAGE HOMES.COM

☐

Individual capacity

☐

Official capacity

## Defendant No. 4

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

"ETAL" GEORGE H. ROBERTSON III / "ETAL" JACQUELINE ROBERTSON  
 1161 E 1203 Tulip Grove Rd  
 HERMITAGE TN 37076  
 City State Zip Code

DAVIDSON COUNTY

☐

Individual capacity

☐

Official capacity

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐Federal officials (a *Bivens* claim)☒

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

ATTACHMENT UPDATED INFORMATION FROM 1<sup>st</sup> COMPLAINT NOW 2<sup>ND</sup>

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

N/A

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur? *ENCROACHMENT USING INTIMIDATION, USING FORCE, FALSE POLICE REPORTS, ARREST, FRAUDULENT DOCUMENTATION, LANDLOCKING, LAND FOOTAGE BLOCKING - DISRUPTION AND CONFUSION - TOWN CODES BROKEN "SEE EVIDENCE" UP DATED" AS WELL AS CRIMINAL ACTIONS.*
- B. What date and approximate time did the events giving rise to your claim(s) occur? *NEW EVIDENCE HAS SURFACE - DOING MORE RESEARCHING AFTER PREVIOUS COMPLAINT UP DATED EVIDENCE SINCE LAST COMPLAINT AND DOCUMENTATIONS*
- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?) *"SEE ATTACHMENTS" FROM LAST COMPLAINT INFORMATION AFTER MY SON AND I MS. FRICERSON DRIVING TO SCOTTSDALE AZ TO DISCUSS THE ISSUES AND MATTER. A 23 hr DRIVE FROM NASHVILLE, TN TO SCOTTSDALE AZ MERITAGE HOMES BASE. TALK TO 5 INDIVIDUALS BEFORE TALKING TO REP MARK ROYMOULD'S "SEE ATTACHMENTS"*

**IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

ATTACHMENTS

NEW UPDATED INFORMATION - AND  
"EVIDENCE" ALL IN PACKET - Responding  
IV. INJURIES ABOVE

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**V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

ATTACHMENTS

"DOCUMENTATIONS"

NEW EVIDENCE Responding TO V. Relief  
ABOVE.

## VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

*Debra J. Freeson 10-26-2013*  
*D.J. & C.R., INC., 1209 Tulip Grove Rd. Herndon, VA 22066*

Signature of Plaintiff

Printed Name of Plaintiff

### B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address



DEBORAH FRIERSON  
8305 Gordon Lane  
Hermitage, TN 37076



Retail



RDC 03



37203

U.S. POSTAGE PAID  
PM  
HERMITAGE, TN 37076  
OCT 24, 2023

**\$18.35**

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Scotch

Clerk U.S. District Court  
Middle District of Tennessee  
119 Church Street, Suite 1300  
Attn: Judge Waverly Crewshaw  
Nashville, TN 37203

RECEIVED  
OCT 25 2023  
U.S. District Court  
Middle District of TN